

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA

- - - - -

MARY LOUISE PEASLEE,)	
Individually and as)	
Executrix of the Estate)	
of Paul C. Peaslee,)	
deceased,)	
)	
Plaintiff,)	
)	
vs.)	Civil Action
)	No. 1:10-cv-105
KAWASAKI MOTORS CORP.,)	
USA, a foreign)	
corporation,)	
)	
Defendant.)	

- - - - -

VIDEOTAPED DEPOSITION OF PAULA PEASLEE

- - - - -

March 9, 2011

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PITTSBURGH SERVICE

EXHIBIT

I

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1 P. Peaslee - by Mr. Marrion
 2 nurse was there, but I'm not sure.
 3 Q. Okay. Was he on pain medicine when
 4 you went up -- when you saw him for the first
 5 time?
 6 A. I don't think so because I got there
 7 probably even before he did.
 8 Q. Okay. Do you recall if he had an IV
 9 in when you saw him?
 10 A. No.
 11 Q. No, he didn't have an IV, or, no,
 12 you don't recall?
 13 A. No, he didn't have an IV.
 14 Q. What, were his legs bandaged at the
 15 time?
 16 A. No.
 17 Q. No?
 18 A. I saw his leg.
 19 Q. What did his leg look like? Let me
 20 back up. Did he have his pants on, his --
 21 A. I've been trying to remember this.
 22 I think his pants were on.
 23 Q. Okay. And so he was in a gurney
 24 when you saw him, like a bed that (indicating) --
 25 A. Yes.

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1 P. Peaslee - by Mr. Marrion
 2 Q. A hospital bed?
 3 A. Yeah.
 4 Q. Okay. As far as you can remember?
 5 A. Well, I guess I'm just picturing a
 6 hospital bed and the emergency room bed. I
 7 think maybe there is a little bit of difference
 8 but --
 9 Q. But he wasn't in a wheelchair?
 10 A. Oh, no.
 11 Q. Okay. And did anyone from your
 12 family show up thereafter once you got to your
 13 father?
 14 A. Like I said, I just saw him for a
 15 minute. And then I went out to the car because
 16 I remember mother and Jason pulling up. As I
 17 was walking back in the hospital, I saw them.
 18 Q. Okay. And Jason is your second
 19 cousin?
 20 A. Yes.
 21 Q. That minute that you saw your
 22 father, did you get a chance to talk to him?
 23 A. Yes.
 24 Q. What did you say to him?
 25 A. I said, the tractor upset on you?

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1 P. Peaslee - by Mr. Marrion
 2 And he said, no, the Mule.
 3 Q. So that first thing that was said
 4 when you came upon your dad at the hospital was
 5 that what you just --
 6 A. Well, no. I -- you know, I
 7 probably --
 8 Q. Probably asked him how are you
 9 doing, or something along those lines?
 10 A. Oh. I'm just sure I said something
 11 loving.
 12 Q. Sure. Of course. And then you said
 13 that phrase about the tractor upsetting on you?
 14 A. Yes. And I've had trouble
 15 remembering this part.
 16 Q. And he said --
 17 A. But, you know, since I had pictured
 18 in my mind that his legs were going to be off,
 19 I'm sure that's when I asked him.
 20 Q. Okay. Of course. And so when you
 21 asked him about the tractor upsetting on him,
 22 he responded by saying, no, it was the Mule?
 23 A. Yes.
 24 Q. Did he say anything else about the
 25 Mule?

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1 P. Peaslee - by Mr. Marrion
 2 A. No.
 3 Q. He didn't say anything else about
 4 how the accident happened?
 5 A. No.
 6 Q. And then you left to go out to your
 7 car?
 8 A. Yes. I maybe stood in the hall for
 9 a while, but I'm just -- I remember when mother
 10 got there, and I knew I was outside; so --
 11 Q. Okay. When you were with your
 12 father for the first time, did he mention
 13 anything about the parking lever?
 14 A. No.
 15 Q. Okay. Now you're with your mother
 16 and your cousin, Jason, out in the parking
 17 area. Did you come back into the hospital?
 18 A. They were right at the door.
 19 Q. Okay. And then what happened next?
 20 A. We got mother out of the car and
 21 went up.
 22 Q. And went up to your father?
 23 A. Right.
 24 Q. Okay. Tell me how that went. Did
 25 you -- was your father in any different

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